



CGB-CC-0352

PASTORS CEDRIC & JOYCE OLIVER

January 17, 2012

Office of the Secretary
Federal Communications Commission
ATTN: Disability Rights Office, Room 3-B431
9300 East Hampton Drive
Capitol Heights, MD 20743

Received & Inspected

JAN 18 2012

FCC Mail Room

RE: REQUEST FOR EXEMPTION FROM COMMISSION'S CLOSED CAPTIONING RULES, Case Identifier CGB-CC-0352

Embassies of Christ Kingdom Ministries (hereby referred to as EOC) respectfully submits this petition requesting exemption from the closed captioning requirements, under section 79.1 of the Commission's rules, 47 C.F.R. & 79.1. EOC believes their program, "You Have a Destiny", qualifies for this exemption for the following reasons:

Part 79.1 Section D Item (8): "You Have a Destiny" is a locally produced and distributed non-news programming with no repeat value. The program is of local public interest, is not news programming, and the "electronic news room" technique of captioning is unavailable.

Part 79.1 Section F

Compliance would impose an undue burden to the "You Have a Destiny" program for the following reasons:

1. It would be necessary to outsource the programs to an outside source for captioning (requesting a minimum of one week's lead time). Our broadcast production team consists of one person, and our broadcast has gone from being on the air one day per week on one station to being on three stations (one of them six days per week). Even when we electronically submit a single program to one station in particular, the upload can take as long as 10 hours. Combined with the lead times imposed upon us by the television stations, this would severely impact our ability to meet airdate deadlines.
2. The program is neither funded nor granted by any outside sources. We are solely responsible for all financial obligations. The estimated closed captioning expense ranges anywhere from \$55,000.00 to \$70,000.00, which places a heavy impact upon the program.
3. The program is an outreach ministry of EOC, whose sole purpose of the program and EOC's ministry is Restoration, Evangelism, Advancing Spiritual Maturity, and Purpose Fulfillment.

Again, we respectfully request that the "You Have a Destiny" program be exempted from the closed captioning requirement for the above stated reasons. We may be reached at:

Embassies of Christ Kingdom Ministries, P.O. Box 1830, Gary, IN 46409; 219-887-6418; scottgtateoc@sbcglobal.net

Sincerely,

Scott G.T. Sloan
Business Manager